

Taylor County Courthouse  
300 Oak Street  
Abilene, Texas 79602



Ph: (325) 674-1032  
Fax: (325) 674-1365  
bollsd@taylorcountytexas.org

County Judge  
**Downing A. Bolls Jr.**  
Taylor County

December 30, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**RE: WC Docket No. 12-375: Inmate Calling Services**

Dear Madam Secretary,

While the Commissioner's Court of Taylor County is in support of reasonable regulation of inmate calling fees and other regulatory reforms and appreciates efforts to protect inmates and their families from excessive fees, we believe that many of the reforms being sought are counter-productive to the taxpaying citizens of this county.

Texas' 254 counties serve their local residents as the functional arm of state government. We cost-effectively provide services ranging from transportation infrastructure to basic healthcare services for the indigent. One of the most expensive functions the county performs is the administration of justice, including operation of the county jail.

Taylor County operates on an annual budget of more than \$57-million dollars. The Taylor County Jail alone contributes more than \$9.4-million dollars to that debt. The bulk of the revenue generated to meet that budget annually comes from ad valorem property taxes (almost 75%). Fines and fees contribute another 21% and the capping of those sources of revenue is among the issues being advocated as part of this study. Counties, however, are facing burdensome budgetary challenges when it comes to their jails; including increasing federal and stated unfunded mandates. Taylor County's inmate calling service contact has generated just under \$109,000 in 2014. The food budget alone at the jail comes to \$700,000, so you can see that those much-feared and

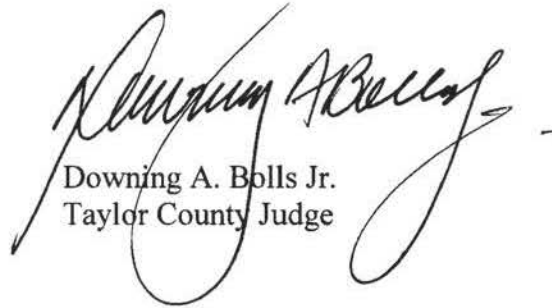
maligned escalations of inmate phone rates simply do not produce that much revenue in Taylor County.

Proponents of the regulations are calling on the FCC, **through stricter regulation**, to pursue policies which will minimize the cost to incarcerated persons and their families and incentivize correctional facilities to expend inmate calling services. What they are asking for in reality is further erosion of local control and a capping of a financial resource which helps pay for the very services they receive, dumping the cost for providing those services on the backs and shoulders of tax-paying, law-abiding citizens. Adding to the burden on private citizens is the potential creation of a special class of telephone rate payers which could pay a much lower rate, shifting the cost of that phone service to those who can pay the higher rates.

In 2015, Taylor County will be initiating for a new inmate calling system which will bring phone service at the jail into the 21<sup>st</sup> century, hopefully addressing many of the present concerns with the current rates and services offered. That, we believe, is how the process should work.

The Commissioner's Court of Taylor County is appreciative of what the Commission is being asked to consider and is understanding of the impact on the inmates and their families, but we are equally concerned about the impact on our "other" citizens, as well. We don't believe that a "carte blanche" approach to inmate phone services; including the adoption and reform of rate caps, is the right answer. And, should the FCC vote to further the study the "issues related to enforcement, disability access, advanced communications in the correctional setting, and the cost/benefit analysis of all of the proposals", we would ask that it be sure to include a funding mechanism other than the unfunded and under-funded mandates passed down to local governments.

Regards,



Downing A. Bolls Jr.  
Taylor County Judge